

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL DEBT
COALITION REGARDING ITS REQUEST TO BE HEARD
AT THE MARCH 4-5, 2020 HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)² submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of March 4-5, 2020 Omnibus Hearing* (ECF No. 11729) (the “Order”), and respectfully states as follows:

¹ The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² See *Fifth Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019* (ECF No. 11161).

1. Susheel Kirpalani and Daniel Salinas of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, will appear in person at the March 4-5, 2020 omnibus hearing in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

2. Mr. Kirpalani intends to address the following matters:

- a. *Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, (A) Setting Briefing Schedule and Hearing Date for Omnibus Objection to Claims Filed or Asserted Against Commonwealth by Holders of General Obligation Bonds Asserting Priority Over Other Commonwealth Unsecured Creditors [Docket No. 10638], (B) Approving Form of Notice and (C) Granting Related Relief* (ECF No. 10754) (the “UCC Procedures Motion”);
- b. *Amended Report and Recommendation of Mediation Team* (ECF No. 10756) (the “Amended Report”).
- c. Any objections, responses, statements, joinders, or replies to the UCC Procedures Motion and the Amended Report.

3. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the LCDC.

DATED: February 28, 2020

Respectfully submitted,

REICHARD & ESCALERA

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SULLIVAN, LLP

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Co-Counsel for the Lawful Constitutional Debt Coalition

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409